

# **EXHIBIT A**



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July 13, 2020

*Via email*

Frank Costello, Assistant United States Attorney  
United States Attorney's Office for the Eastern District of  
Pennsylvania  
615 Chestnut Street, Suite 1250  
Philadelphia, PA 19106  
Frank.costello@usdoj.gov

Re: United States v. John Dougherty, 2:19-cr-00064-JLS

Dear Frank:

As you are aware, the government's honest services fraud and embezzlement cases against Mr. Dougherty and his co-defendants are large and involve many transactions, supporting evidence, and potential witnesses. During the May 21 and July 8 telephone conferences with the Court, the government has represented that it is ready to proceed to trial. The discovery relevant to these cases is enormous; indeed, the production and eventual processing of such discovery spanned many months. Accordingly, we write to request that the government provide Mr. Dougherty with the following information by August 1, 2020, which given this overwhelming amount of discovery, will help Mr. Dougherty prepare efficiently for trial:

1. The specific transactions that the government intends to introduce at each trial (date, location, amount);
2. The specific wiretap recordings that the government intends to introduce at each trial in connection with these transactions
3. The witnesses the government intends to call at each trial (and any statements they have made to the government to the extent they have not already been produced); and
4. Any other evidence upon which the government intends to rely at each trial.

Given the voluminous discovery in this matter – as the government has produced over 40 terabytes of data – disclosure of this information will permit Mr. Dougherty a fair opportunity to prepare for trial.

Frank Costello, Assistant United States Attorney

July 13, 2020

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Please give me or David a call if you would like to discuss this.

Very truly yours,

*/s/ Henry E. Hockeimer, Jr.*

Henry E. Hockeimer, Jr.

HEH:vlc